

EXHIBIT 1

From: [Vuong, Sarah L. \(CIV\)](#)
To: [Arulanantham, Ahilan \(NON-SIDLEY @LAW.UCLA.EDU\)](#); [Weiland, William H. \(CIV\)](#)
Cc: [jessica@ndlon.org](#); [MacLean, Emi \(NON-SIDLEY @ACLUNC.ORG\)](#); [Snyderman, Eric M. \(CIV\)](#); [Restrepo, Luz Maria \(CIV\)](#); [Ross, Catherine \(CIV\)](#); [Bryant, Lauren E \(CIV\)](#)
Subject: RE: NTPSA v. Noem - two items
Date: Monday, February 24, 2025 9:07:16 AM

Hi Ahilan,

We did see that Judge Chen was assigned the new case, however, we do still intend to file an opposition to the motion to relate tomorrow.

Also, regarding the PI, we believe it is appropriate for our response to be due on 3/7, which would be two weeks after service of the motion, and the reply to be filed on 3/14. I did see that the Court set the oral argument for 3/27, so I believe this schedule gives all parties the time they need. Please let me know if you are in disagreement.

Best,
Sarah

Sarah L. Vuong
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From: Arulanantham, Ahilan <arulanantham@law.ucla.edu>
Sent: Friday, February 21, 2025 6:45 PM
To: Vuong, Sarah L. (CIV) <Sarah.L.Vuong@usdoj.gov>; Weiland, William H. (CIV) <William.H.Weiland@usdoj.gov>; Reno, Catherine M (CIV) <Catherine.M.Reno@usdoj.gov>
Cc: [jessica@ndlon.org](#); Emi MacLean <EMacLean@aclunc.org>
Subject: [EXTERNAL] NTPSA v. Noem - two items

Dear Sarah (and William and Catherine),

I hope you are keeping well. I'm writing about two issues related to NTPSA v Noem.

First, it appears that Judge Chen was assigned to this case on the

wheel. If that is so, then we think our motion to relate the case to Ramos appears to be effectively moot, because Judge Chen will be the judge on the case either way. If you agree with that, we would be willing to withdraw our motion and save you the bother of filing your response on Tuesday. To be clear, we would be withdrawing it on the ground that the government has agreed that Judge Chen will preside over the case regardless of whether the motion is granted, given the random assignment. Please let us know your thoughts on that issue.

Second, you may have seen that we filed a motion to postpone the effective date of the vacatur and termination orders last night. (Just in case I've attached the motion and proposed order here, and could send the exhibits if you need them—there are a lot of them).

If you think the government might agree to the motion we would love to discuss it with you.

If the government will not agree to the motion, we would like to shorten the time to the hearing. Our clients, along with a total of about 350,000 people, will lose their right to reside and work in the United States by the first week of April if the orders go into effect. Many of them are already having to make difficult choices about whether to leave, sell assets, or otherwise invest even in the short-term future. For that reason, we believe a decision sooner rather than later (whether favorable to us or not) would be of great value.

We propose that the government file its response brief on Monday March 3, that we file our reply on Friday March 7, and that the Court hear the motion no later than Friday March 21.

Please let us know if that schedule might be acceptable to you, and, if not, if you have another proposal that would shorten the time relative to the default rules.

Take care,
ahilan

From: Vuong, Sarah L. (CIV) <Sarah.L.Vuong@usdoj.gov>

Date: Thursday, February 20, 2025 at 2:26 PM

To: Arulanantham, Ahilan <arulanantham@law.ucla.edu>

Subject: Automatic reply: Ramos v. Nielsen and NTPSA v. Noem; Court Order to Contact Defendants

You don't often get email from sarah.l.vuong@usdoj.gov. [Learn why this is important](#)

I am out of the office from 2/20-2/21 and will be slow to respond. If you need an immediate response, please contact Cathy Reno, catherine.m.reno@usdoj.gov or Will Weiland, william.h.weiland@usdoj.gov.